

BROWNSTEIN HYATT FARBER SCHRECK  
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE CONSTRUCTION  
INDUSTRY AND LABORERS  
HEALTH AND WELFARE TRUST;  
TRUSTEES OF THE CONSTRUCTION  
INDUSTRY AND LABORERS JOINT  
PENSION TRUST; TRUSTEES OF THE  
CONSTRUCTION INDUSTRY AND  
LABORERS VACATION TRUST; AND  
TRUSTEES OF THE SOUTHERN  
NEVADA LABORERS LOCAL 872  
TRAINING TRUST,

Plaintiffs,

vs.

PROJECT DEVELOPMENT GROUP,  
INC., a Pennsylvania corporation, and  
GREAT AMERICAN INSURANCE,

Defendants.

CASE NO. 2:08-cv-00448-LRH-PAL

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
PLAINTIFFS TO FILE  
OPPOSITION TO MOTION TO  
DISMISS**

**[First Request]**

Plaintiffs, Trustees of the Construction Industry and Laborers Health and Welfare Trust; Trustees of the Construction Industry and Laborers Joint Pension Trust; Trustees of the Construction Industry and Laborers Vacation Trust; and Trustees of the Southern Nevada Laborers Local 872 Training Trust (collectively referred to as "Laborers Joint

1 Trust Funds") and Defendant, Project Development Group, Inc., a Pennsylvania  
2 corporation ("Project Development") by and through their counsel hereby stipulate and  
3 agree to the following:

4 WHEREAS, the due date for Laborers Joint Trust Funds to file their opposition to  
5 Defendants' Motion to Dismiss is currently May 19, 2008;

6 WHEREAS, the Laborers Joint Trust Funds' counsel needs additional time to  
7 prepare the Laborers Joint Trust Funds' opposition due to personal and professional  
8 commitments;

9 NOW, THEREFORE, the parties stipulate and request an order giving the Laborers  
10 Joint Trust Funds an additional eight (8) days in which to file their opposition to Project  
11 Development's Motion to Dismiss. This extension is not sought for an improper purpose  
12 or to delay.

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1 Accordingly, the Laborers Joint Trust Funds shall have up and through May 27,  
2 2008, in which to file their opposition to Project Development's Motion to Dismiss.

3  
4 DATED this 19th day of May, 2008.

DATED this 19th day of May, 2008.

5 BROWNSTEIN HYATT FARBER  
6 SCHRECK, LLP

COHEN & GRIGSBY, P.C.

7  
8 /s/ Michael V. Infuso

/s/ Nancy L. Heilman

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17 Attorneys for Plaintiffs

Attorneys for Project Development Group

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19 **ORDER**

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21 **IT IS SO ORDERED.**



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LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE

DATED: May 20, 2008  
Case No. 2:08-cv-00448-LRH-PAL

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